



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO  ESTERED
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us



DAVE MARTIN
Cabinet Secretary

BUTCH TONGATE
Acting Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 14, 2011

Mr. David Scruggs
49 CES/CEAN
Asset Management Flight
550 Tabosa Ave.
Holloman AFB, NM 88330-8458

**RE: NOTICE OF DISAPPROVAL
CLASS 3 PERMIT MODIFICATION REQUEST AND
FACT SHEET/STATEMENT OF BASIS FOR APPROVAL OF NO FURTHER
ACTION FOR EIGHT SOLID WASTE MANAGEMENT UNITS AND AREAS OF
CONCERN, JUNE 2008
HOLLOMAN AIR FORCE BASE, EPA ID# NM6572124422
HWB-HAFB-08-005**

Dear Mr. Scruggs:

The New Mexico Environment Department (NMED) has reviewed Holloman Air Force Base's (the Permittee's) June 20, 2008 request for a Class 3 Permit Modification to RCRA Permit Number NM6572124422, issued on February 24, 2004. The requested modification will grant No Further Action/Corrective Action Complete status for five Solid Waste Management Units (SWMUs) and two (not three; see 1st comment below) Areas of Concern (AOCs) and will transfer these seven sites from Permit Part 4, Appendix 4.A, Table A (SWMUs/AOCs Requiring Corrective Action) to Appendix 4.A, Table B (SWMUs/AOCs Not Requiring Corrective Action). Upon review, the NMED has identified several deficiencies that must be corrected before the permit modification can be proposed for public comment by NMED.

1. **General Comment**

The Permittee shall revise the Fact Sheet/Statement of Basis (FS/SOB) that accompanied the Class 3 Permit Modification Request to delete all references to AOC-S, which is the Base Hospital UST site and is not related to SWMU-130 (SS-46). The title of the FS/SOB shall also be changed throughout the document to reflect that it applies to seven SWMUs/AOCs, not eight.

2. **General Comment**

The Permittee shall submit revised Tables A and B of Appendix 4-A of Permit Part 4 showing redline-strikeout and clean versions of the proposed changes to the Tables.

3. **General Comment**

There are sampling result tables throughout the FS/SOB that do not show the date(s) of the sampling. The Permittee shall revise all applicable tables to show the sampling dates.

4. **Table of Contents, List of Tables**

The Permittee shall revise the FS/SOB's Table of Contents, List of Tables to show Table H5.8.

5. **Page 1, Introduction, Table and Page 5, NFA Criteria, Table**

The Permittee shall revise the "SWMU Title" column for SWMU 130 in these two tables to indicate that the Taxiway Number is 4, not 3, to be consistent with Table A of Appendix 4-A of Permit Part 4.

6. **Page 1, Introduction, 3rd Paragraph**

The Permittee shall revise this paragraph to provide the current primary contact for this action.

7. **Page 2, Section B, History of Environmental Compliance, 1st Paragraph, 3rd Sentence**

The Permittee shall revise this sentence to indicate that the Permit was renewed on February 24, 2004.

8. Page 3, Section D, Public Participation

The Permittee shall revise this Section to provide a discussion about the Public Meeting that the Permittees held on July 8, 2008 and to provide its results (i.e. that no public comments or public hearing request were received).

9. Page 33, LF-21, Table H2.2

The Permittee shall revise this Table to show the results of the December 2005 Long-term Groundwater Monitoring event as shown on Table 8-2 of the *2005 Long-Term Groundwater Monitoring Report* dated May 2006. The Total Dissolved Solids results are of particular importance.

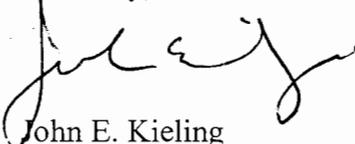
10. Section H.7, SS-48 (AOC-N)

The Permittee shall attach a copy of the November 14, 2006 letter prepared by HydroGeologic, Inc. providing an explanation of the results of the Tier 1 risk assessment performed in response to NMED's October 4, 2006 comments for the *2005 Long-Term Groundwater Monitoring Report* dated May 2006.

The Permittee must submit the revised FS/SOB that corrects the deficiencies noted above by **November 30, 2011**. As part of the response letter that accompanies the revised FS/SOB, the Permittee must include a table that details where all revisions have been made to the FS/SOB and that cross-references NMED's numbered comments. All submittals (including tables) must be in the form of two paper copies and one electronic copy. In addition, the Permittee must submit an electronic redline-strikeout version that includes all changes and edits to the FS/SOB.

If you have any questions regarding this letter, please contact David Strasser of my staff at (505) 222-9526.

Sincerely,



John E. Kieling
Acting Chief
Hazardous Waste Bureau

cc: W. Moats, NMED HWB
C. Amindyas, NMED HWB
D. Strasser, NMED HWB
L. King, EPA-Region 6 (6PD-N)
File: HAFB 2011 and Reading
HWB-HAFB-08-005